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May 13, 2025

VIA CM/ECF

The Honorable Sherry R. Fallon
United States District Court for
the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801

Re: *Rembrandt 3D Holding Ltd v. Technovative Media, Inc., et al*
C.A. No. 23-193-JLH-SRF

Dear Judge Fallon,

We write briefly concerning the Joint Defense and Common Interest Agreement (“Agreement”) attached as Exhibit C to Rembrandt’s Responsive Letter submitted today (D.I. 97). As stated in our Opening Letter, Rembrandt refused to produce any common interest agreement (including the Agreement attached to its response) even though SeeCubic specifically requested such documents during the parties’ meet and confers leading to this dispute. (D.I. 95 at 3). Instead, Rembrandt sandbagged SeeCubic by refusing its reasonable requests and waiting until the filing of its Responsive Letter to disclose the Agreement to SeeCubic for the first time.

Due to Rembrandt’s failure to timely produce the Agreement, SeeCubic respectfully requests that the Court disregard it in its decision on SeeCubic’s Motion to Compel (D.I. 95). Should the Court decide to consider the Agreement, SeeCubic respectfully requests leave to file a one-page reply so SeeCubic can have an opportunity to fully address it before the May 20, 2025 teleconference. Pursuant to L.R. 7.1.1, undersigned counsel discussed this issue with counsel for Rembrandt and Rembrandt indicated it does not oppose the proposed one-page reply.

Counsel is available should Your Honor have any questions.

Respectfully,



Benjamin J. Schladweiler (#4601)

cc: All Counsel of Record via CM/ECF